

CHRISTINA H. WANG, ESQ.  
Nevada Bar No. 9713  
FIDELITY NATIONAL LAW GROUP  
8363 W. Sunset Road, Suite 120  
Las Vegas, Nevada 89113  
Tel: (702) 667-3000  
Fax: (702) 697-2020  
Email: [christina.wang@fnf.com](mailto:christina.wang@fnf.com)  
*Attorneys for Plaintiff*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

|   |   |                                 |
|---|---|---------------------------------|
| THE BANK OF NEW YORK MELLON FKA             | ) | Case No.: 2:17-cv-01242-JAD-VCF |
| THE BANK OF NEW YORK, AS TRUSTEE            | ) |                                 |
| FOR THE CERTIFICATEHOLDERS OF THE           | ) |                                 |
| CWABS INC., ASSET-BACKED                    | ) |                                 |
| CERTIFICATES, SERIES 2006-22,               | ) | <b>JOINT STIPULATION AND</b>    |
|   | ) | <b>ORDER TO STAY CASE</b>       |
| Plaintiff,                                  | ) | <b>PENDING SETTLEMENT</b>       |
|   | ) | <b>NEGOTIATIONS</b>             |
| vs.   | ) |                                 |
|   | ) |                                 |
| NV MORTGAGE, INC. dba SOMA                  | ) |                                 |
| FINANCIAL, a Nevada corporation;            | ) |                                 |
| JONATHON DALE AMOS, an individual;          | ) |                                 |
| MELISSA AMOS, an individual; UNITED         | ) |                                 |
| STATES DEPARTMENT OF THE TREASURY           | ) |                                 |
| – INTERNAL REVENUE SERVICE, a U.S.          | ) |                                 |
| government agency; DOES I through X and ROE | ) |                                 |
| BUSINESS ENTITIES XI through XX,            | ) |                                 |
|   | ) |                                 |
| Defendants.                                 | ) |                                 |

IT IS HEREBY STIPULATED AND AGREED by and between Christina H. Wang, Esq. of the Fidelity National Law Group, counsel for Plaintiff THE BANK OF NEW YORK MELLON FKA THE BANK OF NEW YORK, AS TRUSTEE FOR THE CERTIFICATEHOLDERS OF THE CWABS INC., ASSET-BACKED CERTIFICATES, SERIES 2006-22 (“Plaintiff”); Boris Kukso, Esq. of the U.S. Department of Justice, counsel for Defendant UNITED STATES OF AMERICA (on behalf of the INTERNAL REVENUE SERVICE); and Erick M. Ferran, Esq. of Hitzke & Associates, counsel for Defendants NV

MORTGAGE, INC. dba SOMA FINANCIAL, JONATHON DALE AMOS and MELISSA AMOS, as follows:

**WHEREAS,**

1. On or about October 6, 2017, this Court entered a Discovery Plan and Scheduling Order setting forth the discovery and other deadlines governing this case (Doc. 10).

2. Since then, the parties have actively and in good faith engaged and participated in discovery activities.

3. At this juncture, the parties have agreed to undertake settlement negotiations and believe that they may be able to resolve this case in its entirety.

4. The parties believe that the Discovery Plan and Scheduling Order does not permit sufficient time to both undertake meaningful settlement negotiations and complete all discovery activities.

5. The parties believe that their chances for case resolution are enhanced if they are permitted to continue their remaining discovery activities (including, but not limited to, numerous depositions and written discovery).

6. The parties believe that their chances for case resolution are further enhanced if they are able to devote some of the financial resources currently earmarked for litigation to funding a potential settlement.

7. The parties believe that a stay of this case for ninety (90) days, up to and including April 9, 2018, is reasonable in light of the time necessary to obtain client approval of settlement authority and prepare and finalize all attendant settlement documents.

8. In the event that their settlement efforts fail, the parties will require additional time to resume discovery activities and trial preparation.

**WHEREFORE,**

IT IS HEREBY STIPULATED AND AGREED that a stay of this case for ninety (90) days, up to and including April 9, 2018, would help to accomplish the settlement objectives described herein.

IT IS FURTHER STIPULATED AND AGREED that if this case does not resolve by

1 April 9, 2018, the parties will submit a stipulation and proposed order to lift stay as well as an  
2 updated, proposed Discovery Plan and Scheduling Order extending the case deadlines by the  
3 corresponding period of stay for the Court's approval.

4 DATED this 9<sup>th</sup> day of January, 2018.

5 FIDELITY NATIONAL LAW GROUP

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

6  
7  
8 /s/ Christina H. Wang  
9 CHRISTINA H. WANG, ESQ.  
10 Nevada Bar No. 9713  
8363 W. Sunset Road, Suite 120  
11 Las Vegas, Nevada 89113  
*Attorneys for Plaintiff*

/s/ Boris Kukso  
BORIS KUKSO, ESQ.  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 683  
Washington, D.C. 20044

Of Counsel:  
DAYLE ELIESON  
Interim U.S. Attorney

*Attorneys for the United States of America*

14 HITZKE & ASSOCIATES

15  
16  
17 /s/ Erick M. Ferran  
ERICK M. FERRAN, ESQ.  
18 Nevada Bar No. 9554  
2030 E. Flamingo Road, Suite 115  
19 Las Vegas, Nevada 89119  
*Attorneys for Defendants NV Mortgage, Inc.*  
20 *dba Soma Financial, Jonathan Dale Amos,*  
*and Melissa Amos*

21  
22 **IT IS SO ORDERED.**

23 

24  
25 **UNITED STATES MAGISTRATE JUDGE**

26 Dated: 1-9-2018